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# MEMO ENDORSED.

WRITER'S DIRECT DIAL NO.  
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WRITER'S EMAIL ADDRESS  
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Application **GRANTED.**

**SO ORDERED.**



Ona T. Wang Oct. 3, 2024  
U.S.M.J.

October 2, 2024

**VIA ECF**

Hon. Ona T. Wang  
United States Magistrate Judge  
United States District Court  
Southern District of New York  
500 Pearl Street, Courtroom 20D  
New York, NY 10007

**Re: Borjas v. N.Y.C. Dep't of Education (Case No. 23-CV-10829): Plaintiff's Unopposed Letter Motion for a One-Day Extension to File Her Second Amended Complaint**

Dear Judge Wang:

Plaintiff Stacy A. Borjas, through her undersigned *pro bono* counsel, respectfully requests that the Court extend the filing deadline for Plaintiff's forthcoming Second Amended Complaint ("SAC") from October 6, 2024, to October 7, 2024. Previously, counsel for Plaintiff inadvertently requested a filing deadline that falls on a Sunday—October 6, 2024<sup>1</sup>—and therefore seek a one-day extension so that the filing deadline falls on the next weekday: Monday, October 7, 2024.

Defendants consent to Plaintiff's request for a one-day extension. *See* relevant excerpt of October 2, 2024, email thread between Plaintiff and Defendants at Exhibit 1.

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<sup>1</sup> By way of background, Plaintiff originally filed a Complaint on December 13, 2023 (ECF No. 1), followed by a (First) Amended Complaint on April 2, 2024 (ECF No. 10). Defendant New York City Department of Education subsequently requested an extension for its response, which the Court at the time set for September 23, 2024 (ECF No. 19). On August 15, 2024, Plaintiff filed an unopposed letter motion to set October 6, 2024, as the filing deadline for a SAC and November 22, 2024, as the deadline for Defendants' responses (ECF No. 31)—which the Court granted on August 20, 2024 (ECF No. 34). This is therefore Plaintiff's second request for an extension for the SAC (and third overall request for an extension of any kind in this matter).

**quinn emanuel urquhart & sullivan, llp**

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Respectfully Submitted,

/s/ Sophia Y. Hill  
Sophia Y. Hill

cc: All counsel of record (via ECF)